AO 88B (Rev., 12/13) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for th

Northern District of Texas

_ = = =	Plaintiff V.)) Civil Action No.)
	Defendant)
		ENTS, INFORMATION, OR OBJECTS F PREMISES IN A CIVIL ACTION
To:	Discord, 444 De Haro Street, Suit	e 200, San Francisco, California 94107
i s	(Name of person to w	hom this subpoena is directed)
documents, electronic material: See Exhibit	ally stored information, or objects, and	the at the time, date, and place set forth below the following d to permit inspection, copying, testing, or sampling of the
Place: Sul Lee Law 3030 Lyndon Dallas, Texas	B Johnson Fwy, Suite 220	Date and Time: 8,30, 2022, 12 PM
other property possess	sed or controlled by you at the time, da	D to permit entry onto the designated premises, land, or ite, and location set forth below, so that the requesting party is property or any designated object or operation on it.
other property possess	sed or controlled by you at the time, da	ite, and location set forth below, so that the requesting party
other property possess may inspect, measure, Place: The following Rule 45(d), relating to	sed or controlled by you at the time, da survey, photograph, test, or sample th sprovisions of Fed. R. Civ. P. 45 are a	ttached – Rule 45(c), relating to the place of compliance; a subpoena; and Rule 45(e) and (g), relating to your duty to
other property possess may inspect, measure, Place: The following Rule 45(d), relating to respond to this subpoerty.	sed or controlled by you at the time, da survey, photograph, test, or sample the provisions of Fed. R. Civ. P. 45 are a your protection as a person subject to	ttached – Rule 45(c), relating to the place of compliance; a subpoena; and Rule 45(e) and (g), relating to your duty to
other property possess may inspect, measure, Place: The following Rule 45(d), relating to respond to this subpoerty.	sed or controlled by you at the time, da survey, photograph, test, or sample the survey provisions of Fed. R. Civ. P. 45 are a your protection as a person subject to the survey and the potential consequences of the survey photograph.	Date and Time: Date and Time: ttached – Rule 45(c), relating to the place of compliance; a subpoena; and Rule 45(e) and (g), relating to your duty to not doing so. OR

Notice to the person who issues or requests this subpoena

A notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

EXHIBIT A REQUEST FOR PRODUCTION

1. Produce all information sufficient to identify of the operator and/or owner (the "Infringers") of each of the servers, who uploaded, hosted, and/or contracted with other providers to host the infringing content identified in Exhibit A to the notices dated May 31, 2022, by Sul Lee Law Firm, PLLC, on behalf of Nexon Korea Corporation ("Nexon"), requesting takedown of infringing Maple Story and Sudden Attack material (the "Copyrighted Material") attached to this subpoena, from any and all sources, including but not limited to billing or administrative records that prove the following information used by each of the Infringers, along with a time-stamp, from the time of user registration and to date: name(s), last known address(es), last known telephone number(s), any and all email address(es), account number(s), and billing information (including, but not limited to, names, telephone number(s), and mailing and billing address(es) of each of all of the payment methods (including, but not limited to, credit cards, bank accounts, and any online payment systems)); hosting provider(s); server(s); any other contact information; and any and all logs of IP address(es).

STATE OF TEXAS
COUNTY OF DALLAS

DECLARATION OF DIREN W. SINGHE

888

I, Diren Singhe, declare and testify as follows:

- 1. I am an attorney at law, duly licensed to practice in the State of Texas since 2004, SBOT No. 24044135. I am over the age of majority and under no legal impediment to state the following facts, all of which are true and correct and within my personal knowledge:
- 2. I and my law firm have been engaged to represent Nexon Korea Corporation, a Korean corporation, in connection with this matter. By operation of such engagement and my admission to the State Bar of Texas, I am authorized and qualified to make this declaration for and on Nexon Korea Corporation's behalf, and I make this declaration for that reason.
- 3. Nexon Korea Corporation seeks the issuance of subpoena from this Court pursuant to 17 U.S.C. § 512(h) to obtain information sufficient to identify the persons infringing its copyrighted works. Such dentification is sought so that Nexon Korea Corporation, the rightful copyright holder, can seek legal redress against such infringers. Such personally identifying information will only be used for the purpose of protecting Nexon Korea Corporation's rights under the Copyright Act, 17 U.S.C. § 101, et. seq.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 5, 2022

Diren W. Singhe



SUL LEE LAW FIRM, PLLC 3030 Lyndon B Johnson Fwy

Ste 220, Dallas TX 75234 Tel 214-206-4064

Fax 214-206-4068 Website www.sulleelaw.com

June 23, 2022

Discord VIA Email: copyright@discord.com

ATTN: DMCA Takedown Request 444 De Haro Street

Suite 200

San Francisco, California 94107

RE: Notice of Copyright Infringement; DMCA Takedown Notice

Dear Copyright Agent,

The undersigned firm represents Nexon Korea Corporation ("Nexon" or the "Copyright Owner"), the developer of Sudden Attack, a free-to-play multiplayer shooter online game. We hereby provide notice of copyright infringement pursuant to the terms of the Digital Millennium Copyright Act (the "DMCA") and Discord's Copyright and IP Policy.

Nexon is the owner of the copyrights in the following work(s) (the "Work"):

1. Sudden Attack

It has come to the Copyright Owner's attention that your service located at the URLs as listed in Exhibit 1(the "Service") provides access to materials that infringe Copyright Owner's copyright in the Work. Exhibit 1, as attached hereto, provides a list of the products alleging copyright infringement and the URLs at which the infringing material is accessible on the Service.

The use of the Work in any manner described in this letter is **not authorized** by the Copyright Owner, any agent of the Owner, or any applicable law. As the duly authorized attorneys for the Copyright Owner, we have a good faith basis to believe that all information contained in this notification is accurate.

This letter shall serve as a request that you remove or disable access to the infringing materials as set forth in Section 512(c)(1)(C) and Section 512(d)(3) of the Act and pursuant to your Copyright and IP Policy. Please be advised that if you fail to remove the infringing material, **you could be contributorily liable** for continuing to supply your services to one whom you know, or have reason to know, is engaging in copyright infringement. *See Metro-Goldwyn-Mayer Studios, Inc.* v. *Grokster, Ltd.*, 545 U.S. 913 (2005); *Sony Corp. v. Universal City Studios, Inc.*, 464 U.S. 417 (1984).

Please contact the undersigned no later than <u>four days from the date of this letter</u> to confirm that the infringing materials have been removed or access disabled. The undersigned may be contacted at the mailing address, telephone number, and email address set forth as follows:

Name: Sul Lee Law Firm PLLC

Address: 3030 LBJ Fwy Ste. 220, Dallas, Texas 75234

Telephone: (214) 206-4064 Email: dwilliams@sulleelaw.com

Sincerely,

AGENT FOR NEXON KOREA CORPORATION Sul Lee Law Firm PLLC

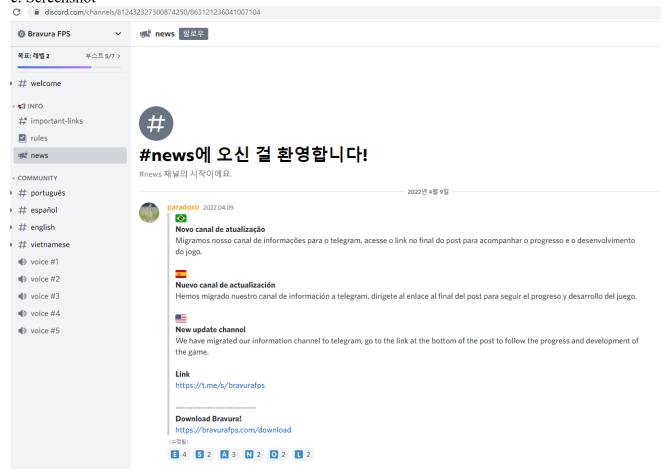
/s/ Dominique Williams
Dominique Williams
Associate Attorney

- 1. Server Name Bravura FPS(https://bravurafps.com/)
- 2. Server ID 812432327300874250
- 3. GM Account ID 281103515399749632, 437373416899739678, 293798382877540352
- 4. Invite Code for Private Server https://discord.com/invite/YxSxydxw7N
- 5. Donation n/a
- 6. Infringing material
 - a. URLs

i.

https://discord.com/channels/812432327300874250/863121236041007104/962100551477248092

- b. Description
 - i. It provides the download links of illegally hacked 'Sudden Attack'
- c. Screenshot





SUL LEE LAW FIRM, PLLC 3030 Lyndon B Johnson Fwy Ste 220, Dallas TX 75234 Tel 214-206-4064

VIA Email: copyright@discord.com

Fax 214-206-4068 Website www.sulleelaw.com

June 23, 2022

Discord
ATTN: DMCA Takedown Request
444 De Haro Street
Suite 200
San Francisco, California 94107

RE: Notice of Copyright Infringement; DMCA Takedown Notice

Dear Copyright Agent,

Our firm represents Nexon Korea Corporation ("Nexon" or the "Copyright Owner"), the developer of Maple Story. We hereby provide notice of copyright infringement pursuant to the terms of the Digital Millennium Copyright Act (the "DMCA") and Discord's Copyright and IP Policy.

Nexon is the owner of the copyrights in the following work(s) (the "Work"):

1. Maple Story

A copy of the registration is attached hereto as Exhibit A.

It has come to the Copyright Owner's attention that your service located at the URLs as listed in Exhibits 1-20 (the "Service") provides access to materials that infringe Copyright Owner's copyright in the Work. Exhibits 1-20, as attached hereto, provides a list of the products alleging copyright infringement and the URLs at which the infringing material is accessible on the Service.

The use of the Work in any manner described in this letter is **not authorized** by the Copyright Owner, any agent of the Owner, or any applicable law. As the duly authorized attorneys for the Copyright Owner, we have a good faith basis to believe that all information contained in this notification is accurate.

This letter shall serve as a request that you remove or disable access to the infringing materials as set forth in Section 512(c)(1)(C) and Section 512(d)(3) of the Act and pursuant to your Copyright and IP Policy. Please be advised that if you fail to remove the infringing material, **you could be contributorily liable** for continuing to supply your services to one whom you know, or have reason to know, is engaging in copyright infringement. *See Metro-Goldwyn-Mayer Studios, Inc.* v. *Grokster, Ltd.*, 545 U.S. 913 (2005); *Sony Corp. v. Universal City Studios, Inc.*, 464 U.S. 417 (1984).

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Name: Sul Lee Law Firm PLLC

Address: 3030 LBJ Fwy Ste. 220, Dallas, Texas 75234

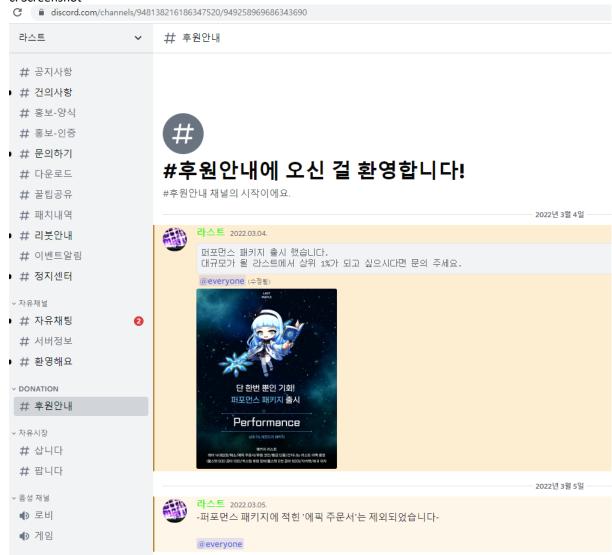
Telephone: (214) 206-4064

Email: dwilliams@sulleelaw.com

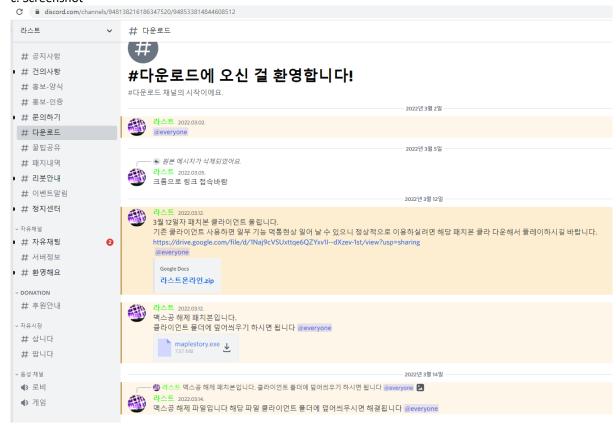
Sincerely,
AGENT FOR NEXON KOREA
CORPORATION
Sul Lee Law Firm PLLC

/s/ Dominique Williams
Dominique Williams
Associate Attorney

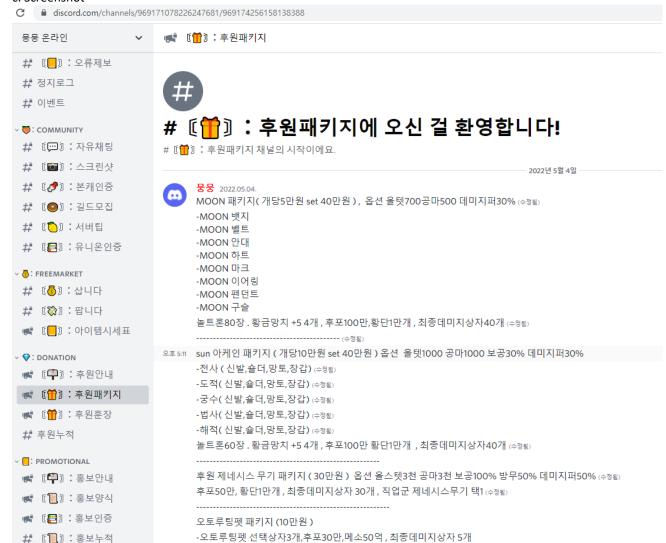
- 1. Server Name 라스트
- 2. Server ID 948138216186347520
- 3. GM Account ID 888088203310018631
- 4. Invite Code for Private Server https://discord.com/invite/wgwrkGaHvG
- 5. Donation
 - a. URLs
 - i. https://discord.com/channels/948138216186347520/949258969686343690/949266938352250900
 - b. Description
 - i. 판매중인 아이템 게시 및 구매 방법 안내(Instructions on how to post and purchase items for sale)
 - c. Screenshot



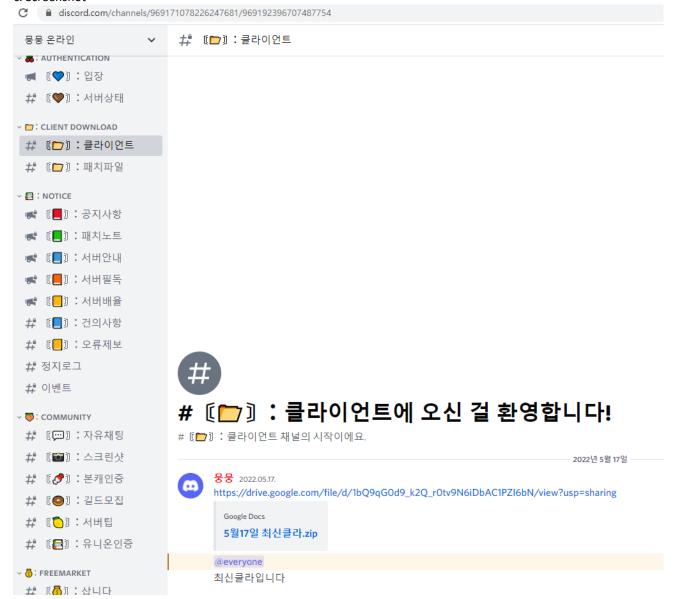
- a. URLs
 - i. https://discord.com/channels/948138216186347520/948533814844608512/952112881707663390
- b. Description
 - i. It provides the files and the download links of illegally hacked 'MapleStory'
- c. Screenshot



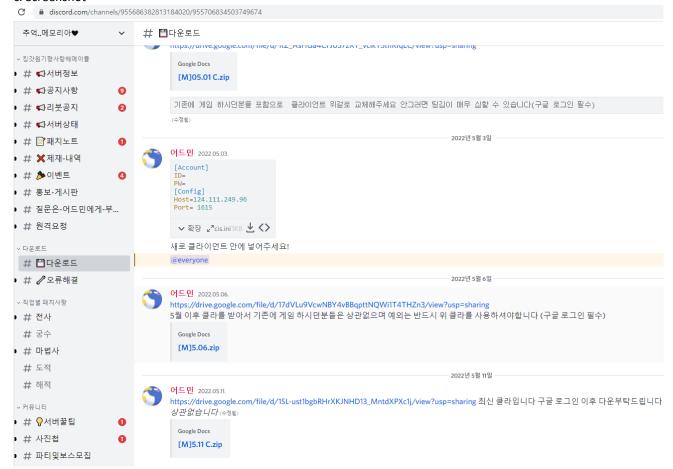
- 1. Server Name 몽뭉
- 2. Server ID 969171078226247681
- 3. GM Account ID 712654825883435030
- 4. Invite Code for Private Server https://discord.com/invite/MUMTvwVxwj
- 5. Donation
 - a. URLs
 - i. https://discord.com/channels/969171078226247681/969174256158138388/971322321317011507
 - b. Description
 - i. 판매중인 아이템 게시 (Posting items for sale)
 - c. Screenshot



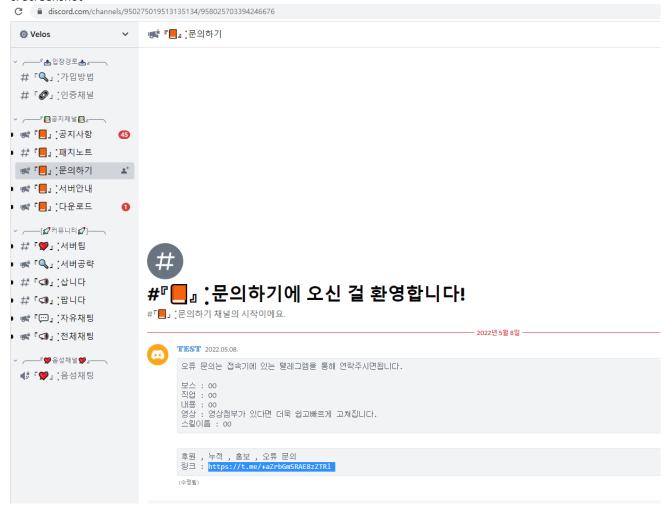
- a. URLs
 - i. https://discord.com/channels/969171078226247681/969192396707487754/975869762666106920
- b. Description
 - i. It provides the files and the download links of illegally hacked 'MapleStory'
- c. Screenshot



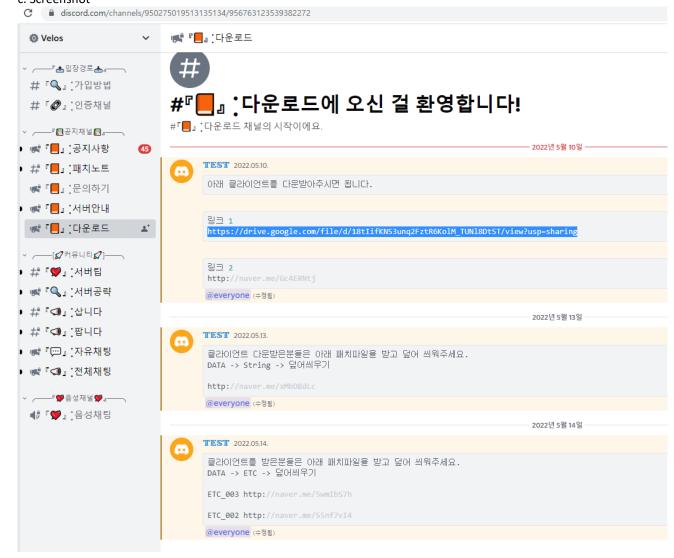
- 1. Server Name 메모리아
- 2. Server ID 955686382813184020
- 3. GM Account ID 955501347246051358
- 4. Invite Code for Private Server https://discord.com/invite/uY2Cr2ygsc
- 5. Donation n/a
- 6. Infringing material
 - a. URLs
 - i. https://discord.com/channels/955686382813184020/955706834503749674/973624756161118248
 - b. Description
 - i. It provides the files and the download links of illegally hacked 'MapleStory'
 - c. Screenshot



- 1. Server Name 벨로스
- 2. Server ID 950275019513135134
- 3. GM Account ID 950274352115511337
- 4. Invite Code for Private Server https://discord.com/invite/HVP47CN47K
- 5. Donation
 - a. URLs
 - i. https://discord.com/channels/950275019513135134/958025703394246676/972827663225991228
 - b. Description
 - i. It provides the telegram link for offering the game's items for sale in the name of donation.
 - c. Screenshot



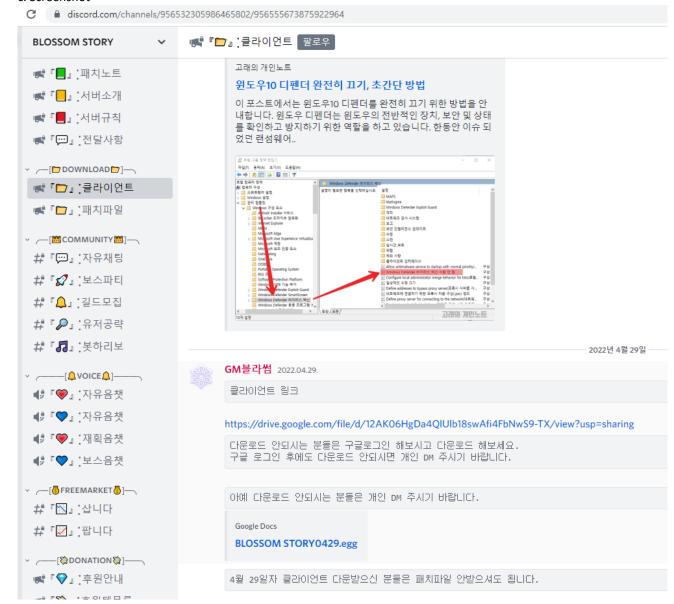
- a. URLs
 - i. https://discord.com/channels/950275019513135134/956763123539382272/973509653524791306
- b. Description
 - i. It provides the files and the download links of illegally hacked 'MapleStory'
- c. Screenshot



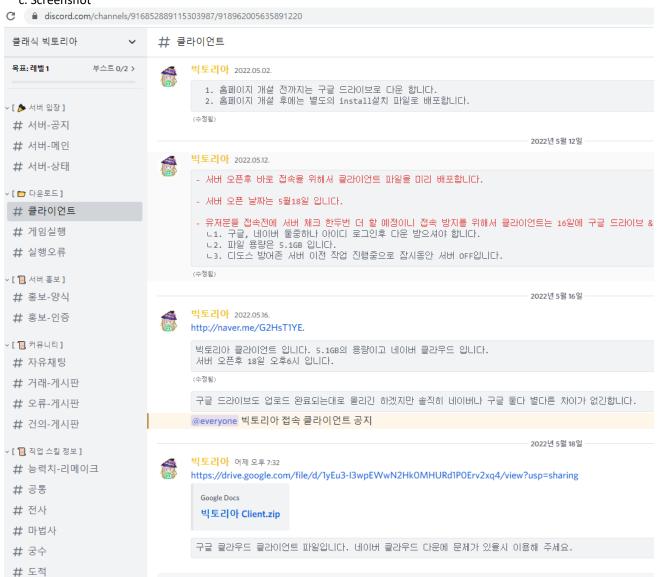
- 1. Server Name 블라썸
- 2. Server ID 956532305986465802
- 3. GM Account ID 946365602644230144, 723311755056644199
- 4. Invite Code for Private Server https://discord.com/invite/dFFHn8NUKs
- 5. Donation
 - a. URLs
 - i. https://discord.com/channels/956532305986465802/956556843314987018/965767771554193438
 - b. Description
 - i. 판매중인 아이템 게시(Posting items for sale)
 - c. Screenshot



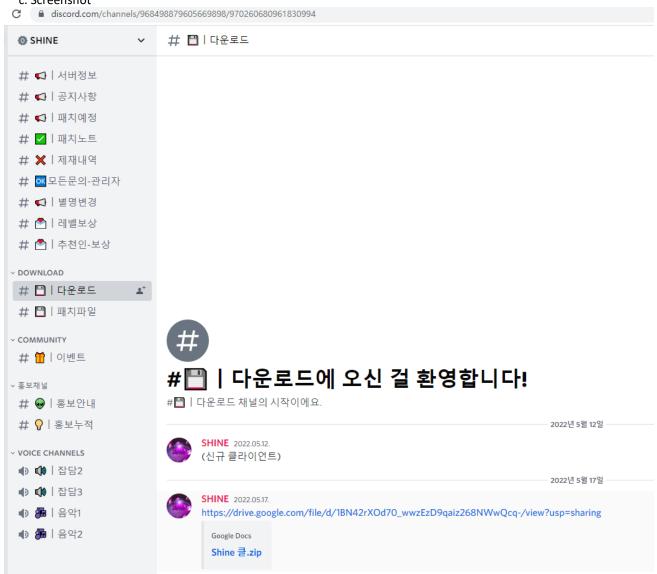
- a. URIs
 - i. https://discord.com/channels/956532305986465802/956555673875922964/969296886689329213
- b. Description
 - i. It provides the files and the download links of illegally hacked 'MapleStory'
- c. Screenshot



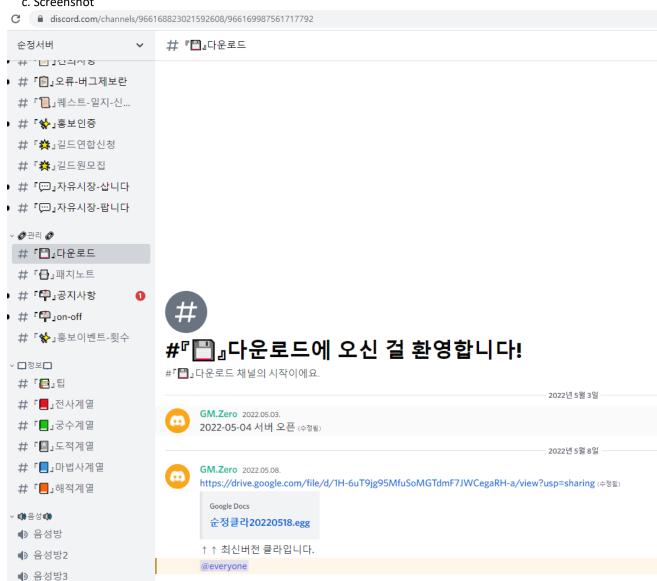
- 1. Server Name 빅토리아
- 2. Server ID 916852889115303987
- 3. GM Account ID 828636903091601459
- 4. Invite Code for Private Server https://discord.com/invite/9CUrMf473S
- 5. Donation n/a
- 6. Infringing material
 - a. URLs
 - i. https://discord.com/channels/916852889115303987/918962005635891220/976432103501758514
 - b. Description
 - i. It provides the files and the download links of illegally hacked 'MapleStory'
 - c. Screenshot



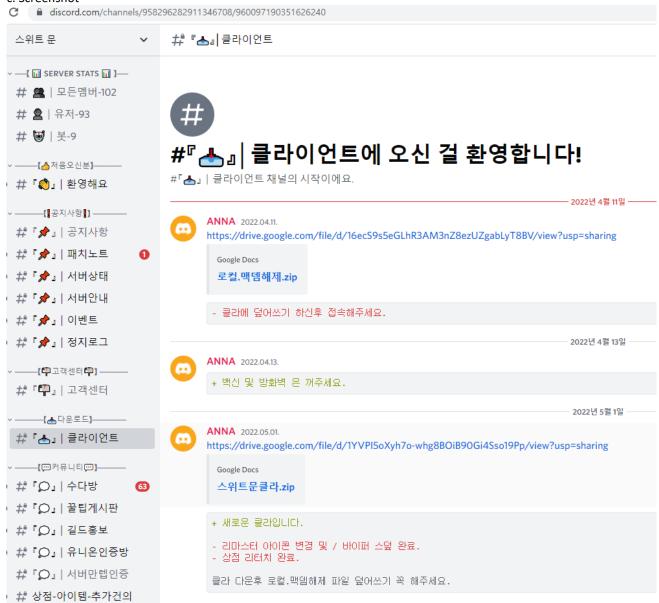
- 1. Server Name 샤인
- 2. Server ID 968498879605669898
- 3. GM Account ID 754437063050264628
- 4. Invite Code for Private Server https://discord.com/invite/g559GVMD
- 5. Donation n/a
- 6. Infringing material
 - a. URLs
 - i. https://discord.com/channels/968498879605669898/970260680961830994/975791190517645362
 - b. Description
 - i. It provides the files and the download links of illegally hacked 'MapleStory'
 - c. Screenshot



- 1. Server Name 순정
- 2. Server ID 966168823021592608
- 3. GM Account ID 290342996942127104
- 4. Invite Code for Private Server https://discord.com/invite/b3FvpAZxJa
- 5. Donation n/a
- 6. Infringing material
 - a. URLs
 - i. https://discord.com/channels/966168823021592608/966169987561717792/972531975023894529
 - - i. It provides the files and the download links of illegally hacked 'MapleStory'
 - c. Screenshot



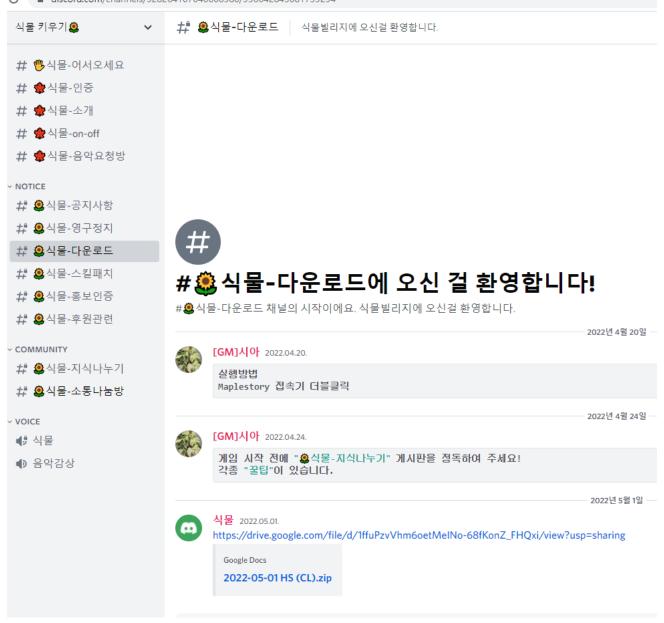
- 1. Server Name 스위트문
- 2. Server ID 958296282911346708
- 3. GM Account ID 957519274983972865
- 4. Invite Code for Private Server https://discord.com/invite/mMDHGg4VUg
- 5. Donation n/a
- 6. Infringing material
 - a. URLs
 - i. https://discord.com/channels/958296282911346708/960097190351626240/970229135999893504
 - b. Description
 - i. It provides the files and the download links of illegally hacked 'MapleStory'
 - c. Screenshot



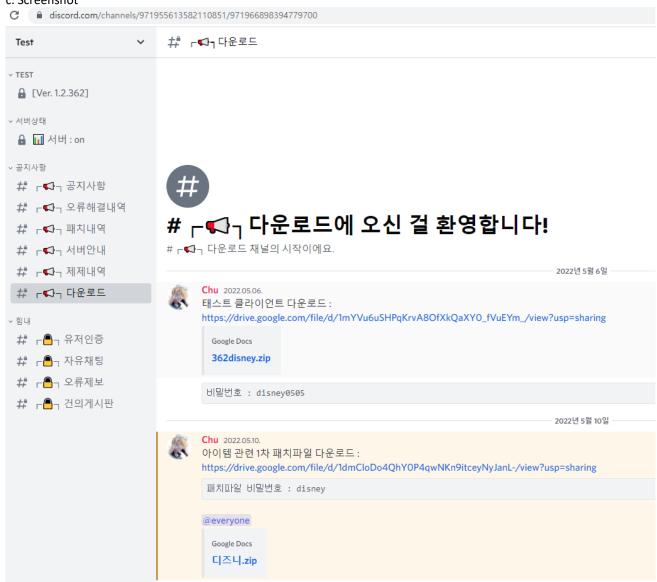
- 1. Server Name 식물 키우기
- 2. Server ID 928264107046608986
- 3. GM Account ID 604147637339291668
- 4. Invite Code for Private Server https://discord.com/invite/9fAxYX4mAs
- 5. Donation
 - a. URLs
 - i. https://discord.com/channels/928264107046608986/966283521633185803/966284529180495872
 - b. Description
 - i. 판매중인 아이템 게시 및 구매 방법 안내 (Instructions on how to post and purchase items for sale)
 - c. Screenshot



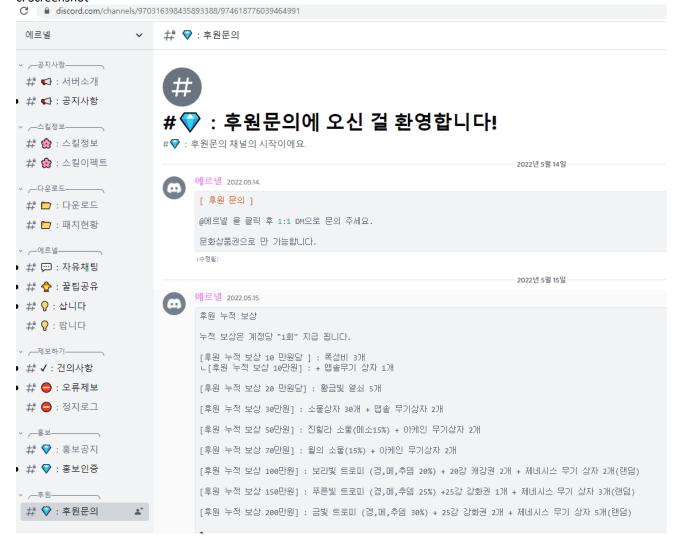
- 6. Infringing material
 - a. URLs
 - i. https://discord.com/channels/928264107046608986/936642845081739294/970279560379768842
 - b. Description
 - i. It provides the files and the download links of illegally hacked 'MapleStory'
 - c. Screenshot
- discord.com/channels/928264107046608986/936642845081739294



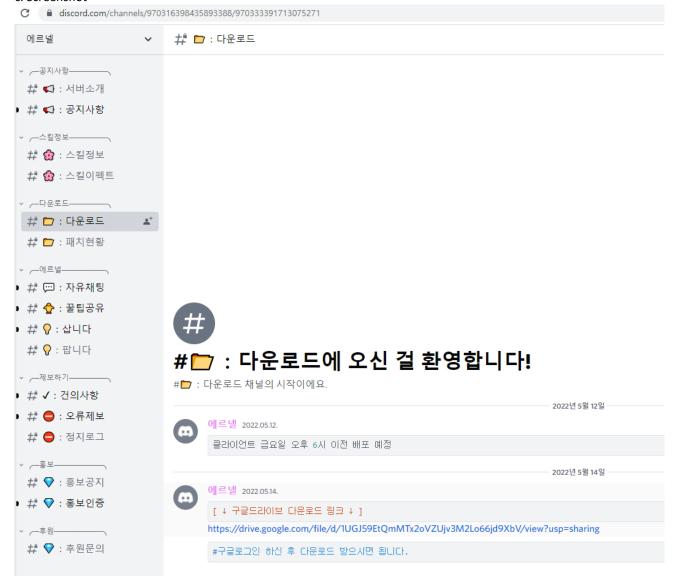
- 1. Server Name 아이리스
- 2. Server ID 971955613582110851
- 3. GM Account ID 760114811488698368
- 4. Invite Code for Private Server https://discord.gg/yyDgeX2zXT
- 5. Donation n/a
- 6. Infringing material
 - a. URLs
 - i. https://discord.com/channels/971955613582110851/971966898394779700/971991727533608980
 - b. Description
 - i. It provides the files and the download links of illegally hacked 'MapleStory'
 - c. Screenshot



- 1. Server Name 에르넬
- 2. Server ID 970316398435893388
- 3. GM Account ID 970289340045459478
- 4. Invite Code for Private Server https://discord.com/invite/bAdgjZsjZx
- 5. Donation
 - a. URLs
 - i. https://discord.com/channels/970316398435893388/974618776039464991/975066902948905061
 - b. Description
 - i. 판매중인 아이템 게시 및 구매 방법 안내 (Instructions on how to post and purchase items for sale)
 - c. Screenshot



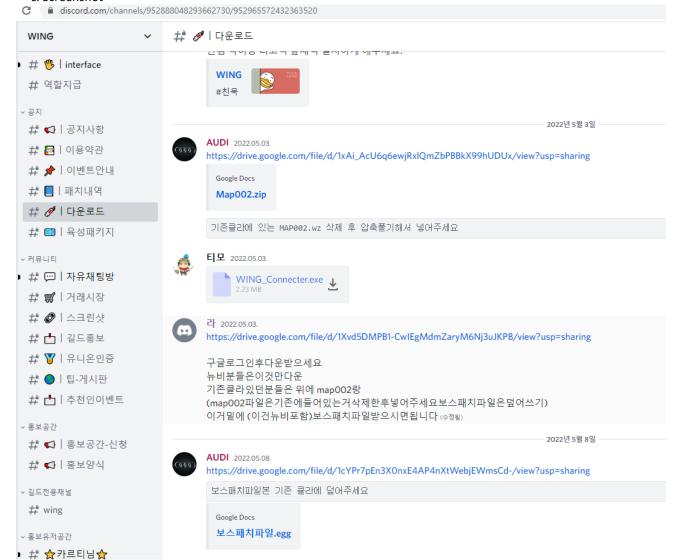
- a. URLs
 - i. https://discord.com/channels/970316398435893388/970333391713075271/974811177517449216
- b. Description
 - i. It provides the files and the download links of illegally hacked 'MapleStory'
- c. Screenshot



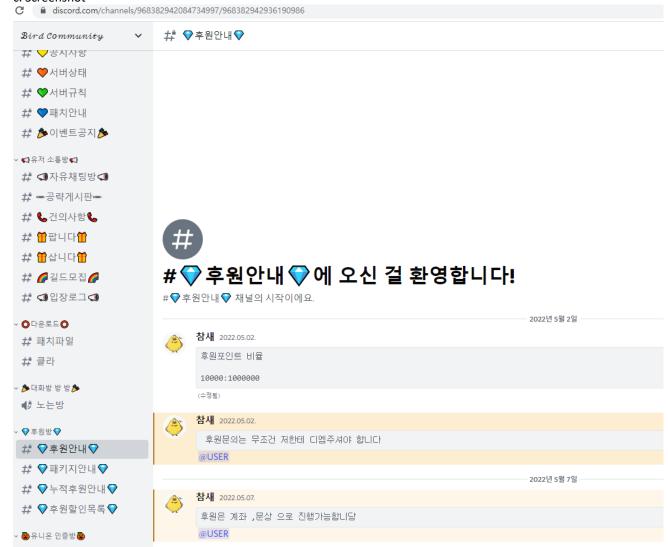
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- 2. Server ID 952888048293662730
- 3. GM Account ID 921909269438271548, 380357126213730316, 967519726769147974
- 4. Invite Code for Private Server https://discord.com/invite/QQf5Ba3VQD
- 5. Donation
 - a. URLs
 - i. https://discord.com/channels/952888048293662730/954033551643390002/959159585384583170
 - b. Description
 - i. 판매중인 아이템 게시(Posting items for sale)
 - c. Screenshot



- a. URLs
 - i. https://discord.com/channels/952888048293662730/952965572432363520/970995212652535848
- b. Description
 - i. It provides the files and the download links of illegally hacked 'MapleStory'
- c. Screenshot



- 1. Server Name 참새월드
- 2. Server ID 968382942084734997
- 3. GM Account ID 958135794227376158
- 4. Invite Code for Private Server https://discord.com/invite/XGzyC7G9
- 5. Donation
 - a. URLs
 - i. https://discord.com/channels/968382942084734997/968382942936190986/970686895929589790
 - b. Description
 - i. 후원 방법 안내 (How to sponsor)
 - c. Screenshot



- 6. Infringing material
 - a. URLs
 - i. https://discord.com/channels/968382942084734997/968382942755819566/975426648973410364
 - b. Description
 - i. It provides the files and the download links of illegally hacked 'MapleStory'

Google Docs

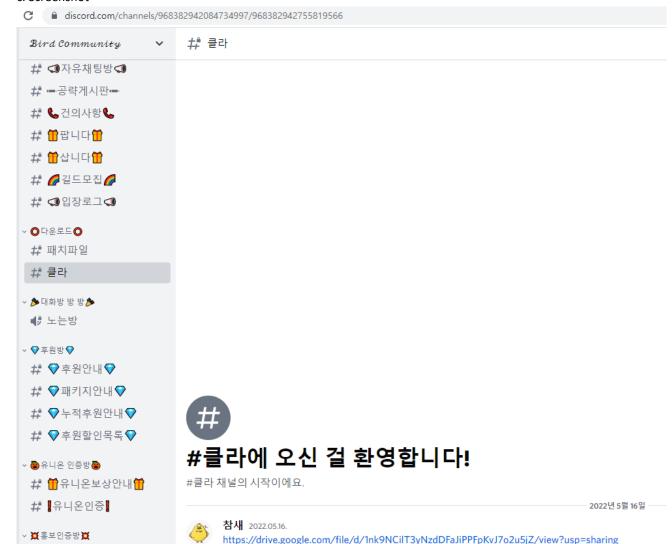
new bird cla.zip

c. Screenshot

▲홍보방식▲

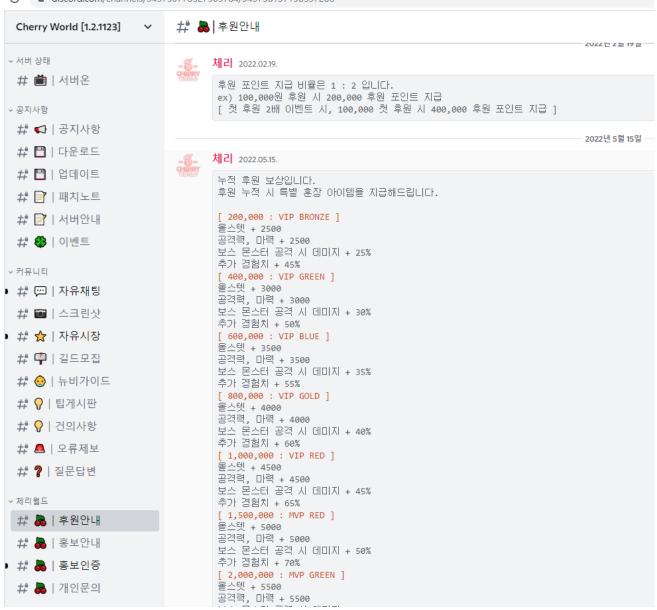
< ♥강화하기♥

🐷 홍보보상안내 🐷



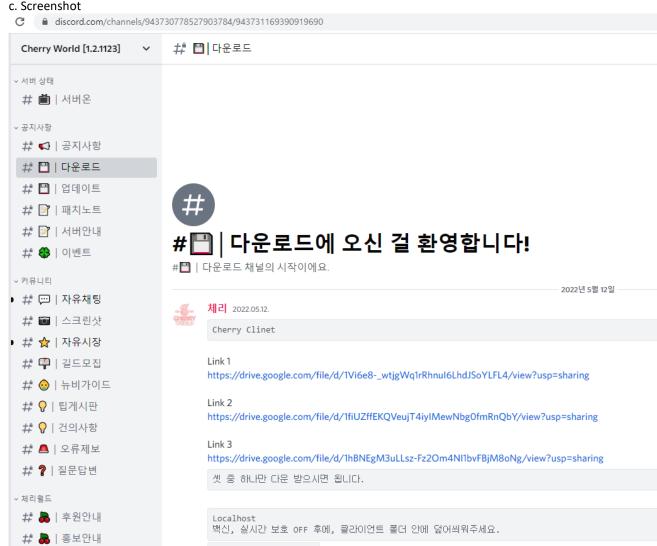
- 1. Server Name 체리월드
- 2. Server ID 943730778527903784
- 3. GM Account ID 500328546971942912
- 4. Invite Code for Private Server https://discord.com/invite/nhMdQNRnJH
- 5. Donation
 - a. URLs
 - i. https://discord.com/channels/943730778527903784/943738197190537286/975334897906499674
 - b. Description
 - i. 판매중인 아이템 게시(Posting items for sale)
 - c. Screenshot

C discord.com/channels/943730778527903784/943738197190537286



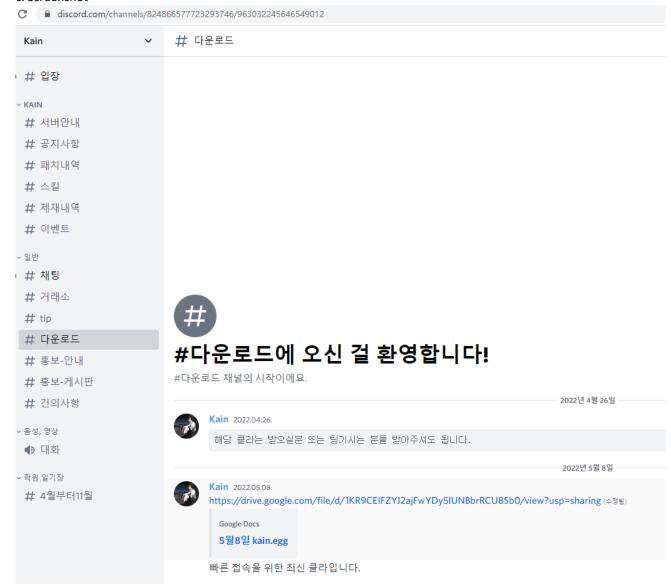
- a. URLs
 - i. https://discord.com/channels/943730778527903784/943731169390919690/974261815519346718
- - i. It provides the files and the download links of illegally hacked 'MapleStory'

🕨 # 퉒 | 홍보인증 # 🔈 | 개인문의

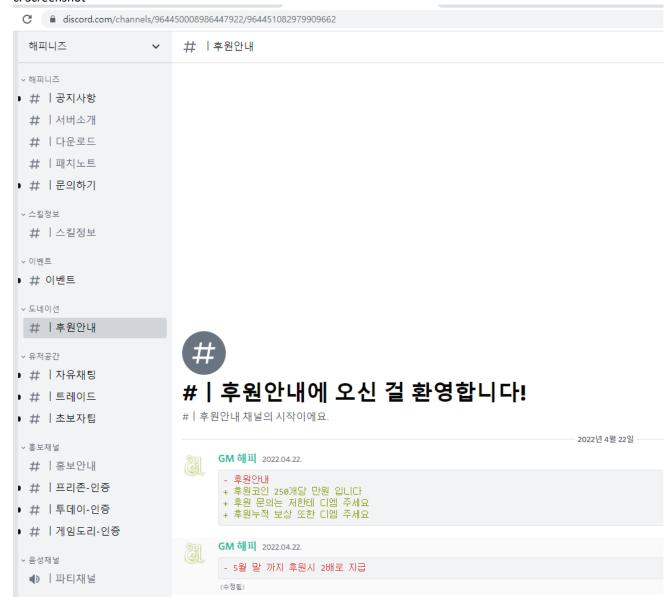


Localhost.zip

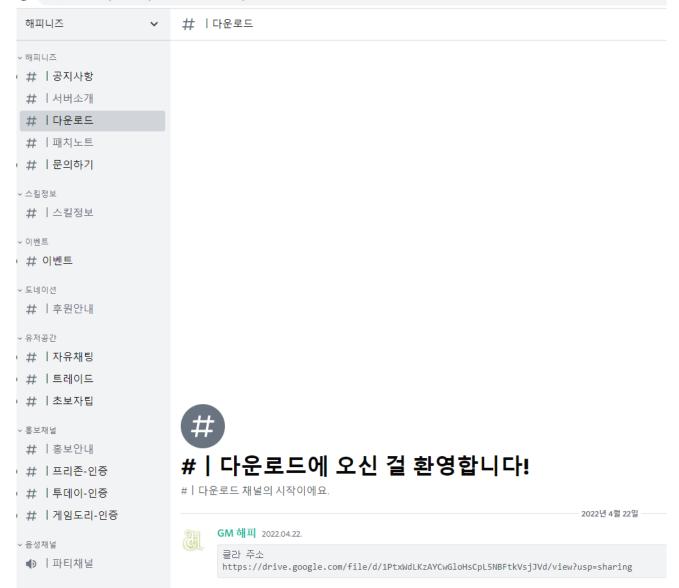
- 1. Server Name 카인
- 2. Server ID 824866577723293746
- 3. GM Account ID 447789123592257546
- 4. Invite Code for Private Server https://discord.com/invite/WjzS3E7G74
- 5. Donation n/a
- 6. Infringing material
 - a. URLs
 - i. https://discord.com/channels/824866577723293746/963032245646549012/972518230990127154
 - b. Description
 - i. It provides the files and the download links of illegally hacked 'MapleStory'
 - c. Screenshot



- 1. Server Name 해피니즈
- 2. Server ID 964450008986447922
- 3. GM Account ID 953656438645997588
- 4. Invite Code for Private Server https://discord.com/invite/2pttgaRbBH
- 5. Donation
 - a. URLs
 - i. https://discord.com/channels/964450008986447922/964451082979909662/966932156557426778
 - b. Description
 - i. 후원 방법 안내(How to sponsor)
 - c. Screenshot

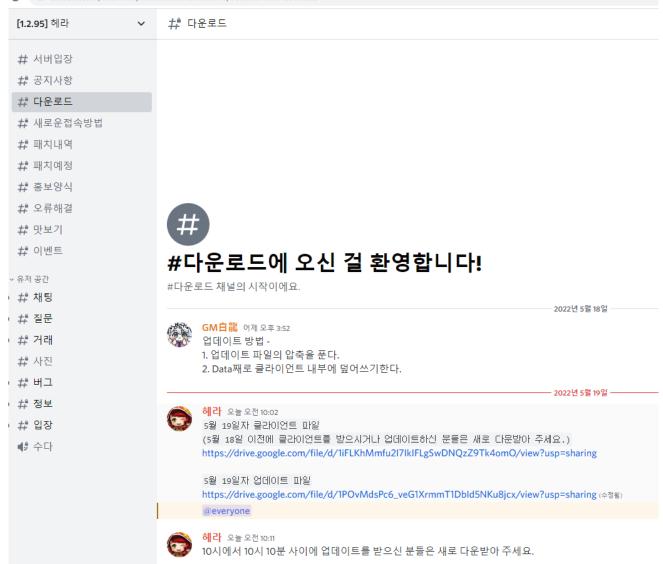


- a. URLs
 - i. https://discord.com/channels/964450008986447922/964450272124469248/966988958577881130
- b. Description
 - i. It provides the files and the download links of illegally hacked 'MapleStory'
- c. Screenshot
- **C** discord.com/channels/964450008986447922/964450272124469248

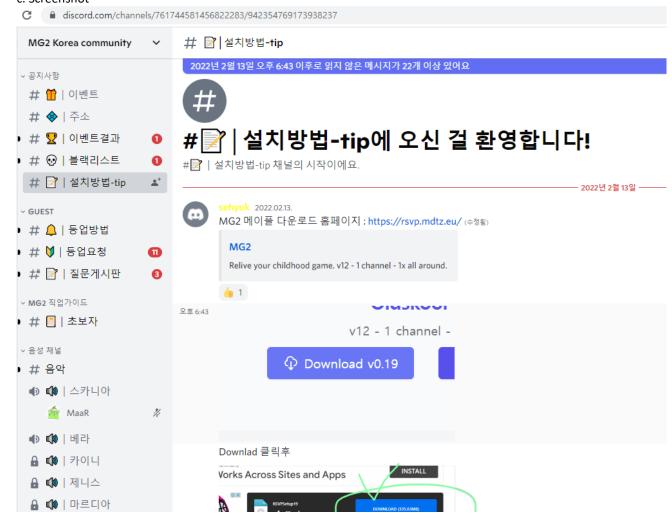


- 1. Server Name 헤라
- 2. Server ID 965263889707200513
- 3. GM Account ID 965266623818792972, 925281481562157067
- 4. Invite Code for Private Server https://discord.com/invite/hytg3c62k4
- 5. Donation n/a
- 6. Infringing material
 - a. URLs
 - i. https://discord.com/channels/965263889707200513/965265796672663622/976651105415073922
 - b. Description
 - i. It provides the files and the download links of illegally hacked 'MapleStory'
 - c. Screenshot

discord.com/channels/965263889707200513/965265796672663622



- 1. Server Name MG2
- 2. Server ID 761744581456822283
- 3. GM Account ID 248777759382306816, 794433164964528149, 344947037705469955, 777407148862472202, 225536719137669120, 593120458854105130, 743628535519772824
- 4. Invite Code for Private Server https://discord.com/invite/RpYDDbu8eu
- 5. Donation n/a
- 6. Infringing material
 - a. URLs
 - i. https://discord.com/channels/761744581456822283/942354769173938237/942355181323034644
 - b. Description
 - i. It provides the files and the download links of illegally hacked 'MapleStory'
 - c. Screenshot



- 1. Server Name 프리웨어
- 2. Server ID 904378504731316245
- 3. GM Account ID 939123778850529310, 215561698508144650
- 4. Invite Code https://discord.gg/m5rqC9HXjv
- 5. Donation n/a
- 6. Infringing material
 - a. URLs
 - i. https://discord.com/channels/904378504731316245/951314373798948864/974871223685226526 ii.https://discord.com/channels/904378504731316245/974146009456328754/974257519448973312
 - b. Description
 - i. 해당 채널에서 해킹된 메이플스토리 클라이언트 파일을 공유토록 하고 있으며, 스크린샷은 현재 공유되고 있는 메이플스토리 클라이언트 파일(The channel allows sharing of the hacked MapleStory client file, and the screenshot is the currently shared MapleStory client file) ii. 해당 채널에서 메이플스토리 사설서버 구축을 대행하고 비용을 받는 이들이 홍보글을 게시하고 있음, 스크린샷은 현재 게시된 사설서버 개발자의 홍보글 (Those who take charge of building a MapleStory private server on the channel, the screenshot is of the currently posted promotional articles)
 - c. Screenshot

